



Matthew Rodriguez
Secretary for
Environmental Protection



Department of Toxic Substances Control

Barbara A. Lee, Director
1515 Tollhouse Road
Clovis, California 93611



Edmund G. Brown Jr.
Governor

October 7, 2015

Ms. Cheryl D. Cobb
Environmental Engineer
Health, Safety & Environmental
Phillips 66 – Los Angeles Carson Plant
1520 E. Sepulveda Blvd.
Carson, CA 90745

Certified # 70140150000098754515

Dear Ms. Cobb:

On May 5-7, 2015, the California Environmental Protection Agency, Department of Toxic Substances Control (Department) conducted a Compliance Evaluation Inspection at Phillips 66 in Carson, California. The enclosed document describes the findings of this inspection.

As a result of this inspection, violations of hazardous waste laws, regulations, and requirements were discovered. The issuance of this letter does not preclude the Department from taking administrative, civil, or criminal action as a result of the violations noted in the report. The Department appreciates your efforts made to come into compliance with hazardous waste laws and regulations.

All pertinent information derived from the inspection, including documents, photographs, sampling results, and copies of documents provided by your facility at the time of the inspection are included to you with the enclosed inspection report.

Please note in the inspection report that violations #1 and #2 have been rescinded based upon the Department's review of the response letter you sent us dated May 28, 2015. However, our review also determined that you are in violation of California Code of Regulations (CCR) Title 22, Section 66262.11 in lieu of the code sections initially cited in violations #1 and #2. Another Summary of Violations citing CCR Section 66262.11 has been included with the inspection report as Attachment D. Please sign and date the first page of the Summary of Violations and mail the original signed copy to the Department's Clovis office. Retain a copy of the Summary of Violations for your records.

LY:smk
LY06a.1015

This cover letter, Summary of Violations, and Inspection Report will become a public document. You may request that any trade secret or facility security information be withheld from public disclosure. (See Health and Safety Code Section 25173). If you wish to assert the trade secret privilege after you have reviewed the document, please provide specific answers to each of the following questions, for each item of concern, within 10 days of the receipt of this letter:

1. To what extent is there knowledge of the information conveyed by the photograph/document outside your business?
2. To what extent is there knowledge of the information conveyed by the photograph/document by employees and others in your business?
3. To what extent have measures been taken to guard the secrecy of the information?
4. Is the information valuable to competitors? If so, why?
5. Has there been substantial monetary expenditure in the development of the information?
6. Could the information be easily and properly acquired or duplicated by others?

The Department will review your response for each item of concern to determine if the information in question should be treated as a trade secret and notify you accordingly.

If you have any questions regarding this letter, or if you wish to meet with the Department to discuss any questions or concerns you may have with the inspection, please call Ms. LeeAnn Young, Environmental Scientist of the Enforcement and Emergency Response Division, at (559) 297-3949.

Sincerely,

Original signed by Dan Lynch

Dan Lynch
Senior Environmental Scientist (Supervisor)
Enforcement and Emergency Response Division

Enclosures